

Law Offices of Ezra Spilke

By ECF

The Honorable P. Kevin Castel  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007-1312

Curfew from 7 PM to 6 AM in lieu of home detention. Terms of release are so modified.  
April 11, 2023  
SO ORDERED  
[Signature]  
4-12-23  
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Re: *United States v. Maria Perez, aka Elisa Martinez*, No. 22 Cr. 658 (S.D.N.Y.)

Your Honor:

At the urging of Pretrial Services, I write to request a modification of the conditions of pretrial release of Maria Perez, true name Elisa Martinez.

Ms. Martinez was released on November 10, 2022, on bail conditions including home detention with electronic monitoring. She has been compliant with the conditions of her release. Pretrial Services Officer Jonathan Lettieri, who supervises Ms. Martinez, does not find the home detention condition to be necessary. It is Pretrial's position that Ms. Martinez's bail should be modified from home detention to a curfew, with the hours set at the discretion of Pretrial Services.

It should also be noted that Ms. Martinez, who was eight-months' pregnant when she was arrested, now has a four-month old baby and no other childcare. Home detention is thus also an undue hardship, not only for Ms. Martinez but also for her baby. Accordingly, Ms. Martinez respectfully requests an order modifying the conditions of her pretrial release in line with Pretrial's recommendation. I have conferred with AUSA Marguerite Colson who informs me that the government takes no position.

Respectfully submitted,

[Signature]

/s/ Ezra Spilke

cc: AUSA Marguerite Colson, by ECF  
Jonathan Lettieri, by email